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November 14, 2023

Via ECF

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Vanaskie:

Plaintiffs respectfully submit this letter in advance of the November 16, 2023
status conference.

1. Update on Losartan/Irbesartan PFS Drafts

The Parties are continuing to meet and confer on these PFSs, and Plaintiffs
will be prepared to discuss their progress during the status conference.

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2. Update on the Status of Manufacturer Defendants' Losartan/Irbesartan Document Productions

In their last agenda letter, Defendants represented that they would begin making productions no later than “mid-November” or continue doing so to the extent they had already started. ([ECF 2525](#), p. 1-2). However, Plaintiffs have not received productions from Aurobindo, Hetero, Sciegen, Teva, or ZHP since the filing of that letter. Plaintiffs also request that these productions be accompanied by production logs that maintain the same format as those used in the valsartan portion of the case as required by the ESI protocol, something which Vivimed declined to do despite the inclusion of this reminder in Plaintiffs' last agenda letter.

3. List of Losartan/Irbesartan NDCs

Plaintiffs are reviewing Defendants proposed stipulation and will respond upon the completion of their review.

Thank you for your courtesies and consideration.

Respectfully,



ADAM M. SLATER

cc: All Counsel (via CM/ECF)